

1 I do respond to every resume that I receive.

2 Q You testified regarding Sean Madden at KFMZ.

3 A Um-hmm.

4 Q And was Sean Madden fired?

5 A No, he quit because of a job, I believe, in
6 Detroit.

7 Q Did you ever discuss Sean Madden with Michael
8 Rice?

9 A Not that I recall. Maybe some time in the car or
10 something. He may have been on the air or something, but I
11 don't remember having any discussion about him.

12 Q So you would have no knowledge of Mike Rice's view
13 of Sean Madden, whether he was a good employee or a bad
14 employee?

15 A Well, Mike's reference would normally be whether
16 he was a good announcer or bad announcer.

17 Q I'm sorry, I missed that.

18 A He would normally say, you know, they were a good
19 announcer or not -- or a bad announcer; not necessary an
20 employee. That wasn't the term he usually used.

21 Q Okay.

22 JUDGE STEINBERG: Well, why don't you ask the
23 question in that context.

24 BY MR. ZAUNER:

25 Q Well, do you recall Mike Rice telling you whether

1 he thought Sean Madden was a good announcer or a bad
2 announcer?

3 A Yes, he thought he was talented.

4 MR. ZAUNER: We have no further questions, Your
5 Honor.

6 JUDGE STEINBERG: I have just a couple. And that
7 is, you worked at the station, you've worked there for a
8 long time.

9 What was your salary in '95, or the amount of
10 income you derived from the station in '95, you personally?

11 THE WITNESS: Let's see, last year I believe it
12 was either 56 or 60 thousand. I don't know for sure without
13 looking at the returns.

14 JUDGE STEINBERG: And this year it would be about
15 the same?

16 THE WITNESS: It will be -- well, hopefully it
17 will be a little bit more because part of my salary is based
18 on the performance of the radio station.

19 JUDGE STEINBERG: Okay. How about Mary Woolsey,
20 what was her salary? Do you know?

21 THE WITNESS: Last year, 25, I believe, 25 or 26.

22 JUDGE STEINBERG: Is that her only job, being
23 general manager of KBMS?

24 THE WITNESS: Yes, it is.

25 JUDGE STEINBERG: How about Robert Cox?

1 THE WITNESS: I don't know.

2 JUDGE STEINBERG: Well, he's a sales manager. So
3 sales managers --

4 THE WITNESS: A lot of his -- his is based on
5 percentages of the station and things of that nature.

6 JUDGE STEINBERG: Approximate?

7 THE WITNESS: I think it was about 40,000. I
8 think it was \$40,000 last year. I'm not sure. I mean, I
9 don't know.

10 JUDGE STEINBERG: Okay, does he have any other
11 job?

12 THE WITNESS: No, he doesn't have any other job.
13 He has other income.

14 JUDGE STEINBERG: And your husband, what's your
15 husband's first name?

16 THE WITNESS: Cloyd, C-L-O-Y-D.

17 JUDGE STEINBERG: And your husband has a company
18 which does business with the stations. At least that's the
19 way Mr. Zauner put it.

20 THE WITNESS: Well, yeah. The only thing my
21 husband, as far as payment is concerned, is if he goes and
22 does a project his expenses are paid.

23 JUDGE STEINBERG: What types of projects are we
24 talking? Is this construction?

25 THE WITNESS: Yes.

1 JUDGE STEINBERG: Because I know ---

2 THE WITNESS: Yes.

3 JUDGE STEINBERG: I know you were talking about
4 leasing a building.

5 THE WITNESS: Right. Property management.

6 JUDGE STEINBERG: Okay.

7 THE WITNESS: Structural things.

8 JUDGE STEINBERG: Do you know about how much this
9 company makes from the business they do with the stations
10 last year?

11 THE WITNESS: Maybe a thousand dollars.

12 JUDGE STEINBERG: That's all?

13 THE WITNESS: Yes.

14 JUDGE STEINBERG: Okay, now, you said there were
15 other sources of income, and I don't want to get into that.

16 THE WITNESS: Well, I can't say anyhow.

17 JUDGE STEINBERG: Well, what I was going to say is
18 your 50 to 60 thousand dollars, about what percentage of
19 that is -- you know, what percentage is that of -- well,
20 then we get the number indirectly. Okay. And you wouldn't
21 tell me probably. Well, you would if I asked nicely.

22 MS. SADOWSKY: Could I ask a question?

23 JUDGE STEINBERG: Sure. You have redirect. You
24 can ask lots of questions.

25 MS. SADOWSKY: Are you finished?

1 Just with respect to that issue.

2 JUDGE STEINBERG: Oh, with respect to that
3 question.

4 MR. ZAUNER: Well, I want to do just a quick
5 follow up on what you are doing. Same lines, same area.

6 JUDGE STEINBERG: Well, let me finish.

7 MR. ZAUNER: That would give --

8 JUDGE STEINBERG: I know. Let me finish.

9 Now, you testified, in response to a question from
10 Ms. Sadowsky, that the stations -- when I say "the
11 stations," I am talking about all three companies -- never
12 had a policy where Mr. Hanks had to clear hires with Mr.
13 Rice.

14 THE WITNESS: That's correct.

15 JUDGE STEINBERG: But you don't know whether Mr.
16 Hanks ever cleared hires with Mr. Rice before Mr. Hanks
17 hired them?

18 THE WITNESS: I don't know. He very well could
19 have because two things, in my opinion, about Chris Kellogg,
20 or Paul Hanks, or whatever it was. One, it was very
21 difficult for him to make a decision. And it was also very
22 difficult for -- and when I say difficult to make a
23 decision, it was difficult for him to make a determination
24 to hire someone or to terminate someone. And he always had,
25 in my opinion, he had to have second opinion, a third

1 opinion or something, in order to justify what he was or
2 wasn't going to do.

3 JUDGE STEINBERG: Okay. Let's have Ms. Sadowsky
4 redirect, and then I will let you have an opportunity.

5 MR. ZAUNER: Okay. Because it was a follow up on
6 yours. It might give Ms. Sadowsky to do it all at one time.
7 So however you want to do it is fine.

8 JUDGE STEINBERG: I don't mind if he goes and then
9 you can wrap up in one --

10 MS. SADOWSKY: I might mind what he has to say.

11 JUDGE STEINBERG: Okay.

12 SURREBUTTAL REDIRECT

13 BY MS. SADOWSKY:

14 Q Ms. Cox, if you didn't have this job with
15 Contemporary, would you and your husband continue to live in
16 the style to which you have been accustomed?

17 A Yes.

18 MS. SADOWSKY: That's all I have.

19 JUDGE STEINBERG: I'll let Mr. Zauner.

20 SURREBUTTAL RECROSS-EXAMINATION

21 BY MR. ZAUNER:

22 Q My question that was going to be a follow up was,
23 in addition to your salary for working for the station, do
24 you receive other benefits such as an automobile?

25 A Yes. It's in my contract. I believe you have

1 that.

2 Q Does your daughter as general manager receive
3 other benefits?

4 A She receives hospitalization.

5 Q Other than the normal --

6 A No, just the same as the other full-time employees
7 would.

8 Q There is no automobile?

9 A No.

10 Q Any trade-out benefits that she gets?

11 A No. We have trade-outs, but those are for all
12 employees, not necessarily a particular individual.

13 Q And the same thing with regard to your son, does
14 he has a sales manager have use of a company automobile?

15 A No.

16 Q Does he have the direct benefit of any trade-outs
17 at the station he enters into?

18 A The same as any other employees do.

19 Q And that would be -- what kind of trade-outs are
20 there?

21 A Well, I mean, they get concert tickets, or, you
22 know, things of that nature. Those are available to any and
23 all employees.

24 Q Now, your husband, Cloyd, you indicated had an
25 income of \$1,000 from the stations.

1 Isn't it a fact that you and he have a business
2 where you own property which is rented by the stations?

3 A Not anymore.

4 Q Not anymore.

5 MR. ZAUNER: Okay, thank you. No further
6 questions.

7 MS. SADOWSKY: Your Honor, I have no further
8 questions of the witness at this time, but on further
9 consideration we want to withdraw the offer of Contemporary
10 Exhibit No. 6.

11 JUDGE STEINBERG: Okay, so Contemporary Exhibit
12 No. 6 is withdrawn. And you can get your copies back from
13 the reporter.

14 THE COURT REPORTER: I was never given a copy,
15 Your Honor.

16 JUDGE STEINBERG: Well, then you can't get your
17 copies back from the reporter.

18 Okay, let's go off the record.

19 (Whereupon, a recess was taken.)

20 JUDGE STEINBERG: We are back on the record, and
21 we are going to break for lunch now, and resume with who?

22 MS. SADOWSKY: Richard Hauschild.

23 JUDGE STEINBERG: At 1:30.

24 MS. SADOWSKY: H-A-U-S-C-H-I-L-D.

25 THE COURT REPORTER: Yes, thank you.

1 JUDGE STEINBERG: Okay, we will be in recess until
2 1:30.

3 Thank you.

4 (Whereupon, at 12:26 p.m., the hearing was
5 recessed, to resume at 1:30 p.m., this same day, Wednesday,
6 May 22, 1996.)

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A F T E R N O O N S E S S I O N

(1:29 p.m.)

JUDGE STEINBERG: Back on the record.

Ms. Sadowsky.

MS. SADOWSKY: Yes, Your Honor, at this time I would like to present Richard Hauschild.

JUDGE STEINBERG: Please raise your right hand.

Whereupon,

RICHARD HAUSCHILD

having been first duly sworn, was called as a witness herein and was examined and testified as follows:

JUDGE STEINBERG: Please be seated.

SURREBUTTAL DIRECT EXAMINATION

BY MS. SADOWSKY:

Q Good afternoon, Mr. Hauschild.

You have presented testimony in this proceeding already in written form; is that correct?

A Correct.

Q Therefore, I am not going to run over material that's already there.

I want to ask you some questions concerning KFMZ, particularly during your tenure there as the general manager of the station.

JUDGE STEINBERG: Did he state his name and address for the record?

1 MS. SADOWSKY: He did not. I apologize.

2 BY MS. SADOWSKY:

3 Q Would you state your name and address for the
4 record?

5 A Full name is John Richard Hauschild, Jr. My
6 address is in Columbia, Missouri.

7 Q Street address?

8 A Street address is 503 North Brookline Drive.

9 Q Mr. Hauschild, who was responsible for hiring on-
10 air personnel at KFMZ?

11 A That is almost exclusively on hiring the program
12 director's responsibility with my consultation, generally
13 after we have a candidate that the program director is
14 recommending.

15 Q Was it necessary for any hiring decisions to be
16 cleared with Mr. Rice, Michael Rice?

17 A No.

18 Q If I told you that Mr. Hanks testified that he
19 cleared all hiring decisions with Mr. Rice because it was a
20 requirement, would that be a surprise to you?

21 A It certainly would since I have been manager.

22 Q Now, there was at one time an employee by the name
23 of Janice Pratt at your station.

24 Can you tell me why Ms. Pratt was fired?

25 A Janice was fired because she did not respond to

1 repeated warnings that she, number one, arrive at work on
2 time. She was required to be at the radio station at 11:00
3 p.m. in the evening. She was negligent in a small but
4 critical task of making sure that every commercial for the
5 subsequent day was in the studio. When it wasn't, she was
6 to at least leave notes for people or make a real effort to
7 find those commercials so they wouldn't be missed since they
8 had been scheduled. And she regularly missed that duty.
9 She missed it.

10 She also from time to time would violate one of
11 our basic station policies, and that's have visitors in the
12 studio for a great length of time.

13 Q Did Mike Rice ever tell you to get rid if Janice
14 Pratt?

15 A No, no, he didn't.

16 I was the one who actually asked Chris to dismiss
17 her about six months before she was dismissed. Dismiss her
18 or make sure she corrected the problems.

19 JUDGE STEINBERG: When you said "Chris," Chris
20 who?

21 THE WITNESS: I'm sorry. Let's establish for the
22 record I worked with this gentleman for six years under the
23 name of Chris Kellogg. His legal name is Paul Hanks.

24 BY MS. SADOWSKY:

25 Q Now, did Paul Hanks ever tell you that Mike Rice

1 directed him to fire Janice Pratt?

2 A No.

3 Q Did Paul Hanks ever tell you that Mike Rice made
4 critical comments about Janice Pratt's voice on the air?

5 A No.

6 Q And do you know why there was a six-month period
7 from the time you originally told Mr. Hanks that Janice
8 Pratt needed to -- I think, if I am not correct, you can
9 correct me -- that Janice Pratt either needed to clean up
10 her act, so to speak, or he should fire her.

11 Do you know why it took six months before the
12 firing ever occurred?

13 A Well, the real period of time, I believe, was
14 about January to October. But in January, it was as you
15 stated, either start showing up to work on time and take
16 care of the business you need to take care of, or look for
17 work elsewhere. She was becoming a bit of an impediment,
18 and this was an entry level position. This was a position
19 that, frankly, should not and ultimately was not difficult
20 to find someone to replace her because there are a lot of
21 people looking to get into the business at this level.

22 Chris was unable to find someone to replace her,
23 or was dragging his feet, and other things took priority.

24 Q Did you -- did Mr. Hanks have difficulty with the
25 hiring and firing process in general?

1 MR. MASTANDO: Objection. That's a leading
2 question, Your Honor.

3 JUDGE STEINBERG: No, it's not.

4 MS. SADOWSKY: I'm not suggesting the answer.

5 JUDGE STEINBERG: It's overruled.

6 That means you can answer if you can remember what
7 it was.

8 THE WITNESS: Oh, I can remember what it was.

9 She said did he have problems hiring and firing.
10 He had a lot of trouble finding people, it would seem, and
11 it was also something that I'm not sure that he really
12 enjoyed doing. Therefore, he put it off.

13 One of the problems that we had with him over the
14 years was finding good part timers; having a full staff of
15 part timers is critical to a successful operation of a radio
16 station. So that your full timers don't have to work
17 additional shifts.

18 BY MS. SADOWSKY:

19 Q Let me ask you about Robert Kinneson. Do you
20 recall Robert Kinneson being employed at the station?

21 A Yes.

22 Q And what was his position?

23 A He was a part-time announcer; primarily evenings
24 and weekends.

25 Q Do you know who instigated the firing of Robert

1 Kinneson?

2 A I believe Chris did based on, for one thing, my
3 suggestion.

4 Q And what suggestion was that?

5 A That he was not following the format. He was not
6 adapting to the format. He was trying to turn a music
7 station into a talk station.

8 Q Did Mike Rice ever make any comments to you about
9 Robert Kinneson's performance?

10 A No.

11 Q Did Paul Hanks ever tell you that Mike Rice wanted
12 him -- him meaning Kinneson -- fired?

13 A No.

14 Q To your knowledge, did Mike Rice have any
15 involvement at all in the firing of Robert Kinneson?

16 A No.

17 Q Turning your attention to Sean Madden, can you
18 tell me what Mr. Madden's position was at the station? Can
19 you tell me what position Mr. Madden had?

20 A The position he held last at the station was music
21 director, and the seven to midnight shift, air shift.

22 Q Now --

23 A Prior to that he had been part of a morning show.

24 Q Who brought Sean Madden to KFMZ?

25 A I actually instigated the contact initially

1 because I had worked with him at other radio stations. And
2 I found that he had left the city and had gone down to Cape
3 Gerardo, and was interested in returning.

4 Q Did Michael Rice ever make any critical comments
5 about Madden's performance on the air?

6 A No, not to me.

7 Q Did Paul Hanks ever tell you that Mike Rice didn't
8 like Sean Madden's sound or personality on the air?

9 A No.

10 Q Did Paul Hanks ever tell you that he didn't like
11 Sean Madden?

12 A Not directly.

13 Q Did Sean Madden ever discuss with you any problems
14 he had with Chris Kellogg or Paul Hanks?

15 A Yes, just philosophical more than anything else.

16 Q And do you know whether Paul Hanks ever wanted to
17 fire Sean Madden?

18 A No, I do not.

19 Q And Sean Madden was not fired, was he?

20 A No, he was not. He took a job with a radio
21 station in Detroit. He was demoted after First Syndicated
22 Research, which is put out by, of course, Arbitron, and then
23 we did our own study, and he was demoted from the morning
24 show to the evening. Actually, it was a sideways promotion
25 you might say because he was given a small raise and given

1 the responsibility as music director. He also was relieved
2 of his morning shift duties. So I think he looked at it as
3 a bit of a demotion.

4 Q And it's true -- well, strike that.

5 When he went from the morning show to the evening
6 show, he no longer had a side kick with him on the evening
7 show, correct?

8 A Correct.

9 Q And he had had a side kick named Sally on the
10 morning show; is that correct?

11 A Yes, and she took over the afternoon position
12 simultaneously when the move was made.

13 Q And was Madden unhappy about not working with
14 Sally?

15 A Yes.

16 JUDGE STEINBERG: Watch the leading.

17 MS. SADOWSKY: Okay.

18 BY MS. SADOWSKY:

19 Q Turning your attention to Jeff Davis, do you know
20 who fired Jeff Davis?

21 I'm sorry. Was Jeff Davis fired?

22 A Yes, Jeff was relieved of his responsibilities in
23 a meeting at which Chris and myself jointly did it.

24 Q Did Mike Rice direct you to fire --

25 A No.

1 Q -- Jeff Davis?

2 Do you know whether Mike Rice directed Paul Hanks
3 to fire Jeff Davis?

4 A No, I do not. I do not.

5 Q Did Mike Rice ever tell you that Davis was too
6 old?

7 A No.

8 Q Did Paul Hanks ever tell you that Mike Rice wanted
9 Davis fired?

10 A No.

11 Q In that meeting that you testified to, did Paul
12 Hanks reference Mike Rice's attitude or feelings about --

13 A No.

14 Q Let me finish the question.
15 About Jeff Davis.

16 A No.

17 Q Did Paul Hanks ever express any reluctance about
18 firing Davis?

19 A Perhaps a little bit. Not massively, but they had
20 worked together off and on for seven or eight years at that
21 time.

22 Q Do you know why Davis was, or why was Davis fired?

23 A Number one, he was fairly discontent as he would
24 often share with me. He and his wife were making plans at
25 the time to go back to Kentucky, or how home town,

1 Louisville, Kentucky, her home town. He had taken the job
2 somewhat reluctantly because he needed the job. He had been
3 working with us part time for quite awhile, and he lost his
4 full-time job. And he had worked at the station previously
5 as a full-time announcer doing 10 to three, doing the
6 middays, which he enjoyed.

7 When he asked if he could come back, the only
8 thing we did have available at the time was seven to
9 midnight, and he reluctantly took it. And he was regularly
10 telling me how much his wife did not like him not being
11 around from seven till midnight every evening. They had a
12 new baby at the time.

13 So when a more favorable candidate appeared, and
14 also someone I had known for quite some time who had worked
15 for the station previously came back to town and said he
16 really would like to have a job, that was when Chris and I
17 sat down with Davis, and said, look, you have expressed a
18 dissatisfaction, this, this and this, you may be leaving
19 shortly. Mark is back in -- Mark Rose is back in town, and
20 we would really like to have him on, so I'm afraid that's
21 going to mean we no longer need your services. And he was
22 very -- it was a very amiable parting.

23 JUDGE STEINBERG: How old a gentleman was Mr.
24 Davis at the time?

25 THE WITNESS: Oh, at the time, 35.

1 JUDGE STEINBERG: But isn't that a bit old for
2 someone to fill a seven to midnight slot?

3 THE WITNESS: It's a little older than we normally
4 would have, yes.

5 JUDGE STEINBERG: So did -- well, did you ever
6 discuss the age question with Mr. Rice, in terms of the age
7 of Mr. Davis?

8 THE WITNESS: No.

9 JUDGE STEINBERG: Do you know if Mr. Rice believed
10 that Mr. Davis was too old for that particular position?

11 THE WITNESS: No, I really don't.

12 BY MS. SADOWSKY:

13 Q Turning your attention to Paul Hanks, when -- you
14 fired Mr. Hanks; is that correct?

15 A Yes, I did.

16 Q And when you fired him, did you give him an option
17 to resign?

18 A I did.

19 Q Was it company policy to do so, to give an
20 employee an option to resign?

21 A No, I don't know that there had been any policy
22 like that established. I did it because of the nature of
23 the situation.

24 Q Can you elaborate?

25 A He is very prideful, and I knew he would have

1 difficulty -- I knew this would hurt. He during the time we
2 worked together did not take criticism very well. Reacted
3 pretty negatively to most criticism. And obviously this is
4 the ultimate criticism. We no longer need your services.

5 So as much to save face within the building as
6 anything else, I gave him that option.

7 Q Now, Mr. Hauschild, you were present at a
8 deposition of Mr. Hanks in connection with the
9 discrimination suit he has filed against the company,
10 correct?

11 A Correct.

12 Q Do you recall hearing comments made by Mr. Hanks
13 in connection -- strike that.

14 Do you recall any particular comments that Mr.
15 Hanks may have made regarding Mr. Rice at that session?

16 A The only comment that I recall him making was
17 toward the end of the questioning where he was getting very
18 agitated about the whole process, and had been asked, well,
19 what did he really want. And he said, "I want to get the
20 station, the company, Mike Rice, and everything the law is
21 going to allow me" as he was getting very temperamental and
22 agitated at that time. And that was right before we wrapped
23 it up. So that was it.

24 MS. SADOWSKY: That's all I have. Thank you.

25 JUDGE STEINBERG: Do you want a break?

1 MR. ZAUNER: Yes.

2 MR. MASTANDO: Please, Your Honor.

3 JUDGE STEINBERG: How long?

4 MR. MASTANDO: Ten minutes.

5 JUDGE STEINBERG: Okay, then minutes.

6 (Whereupon, a recess was taken.)

7 JUDGE STEINBERG: We are back on the record.

8 Mr. Mastando.

9 SURREBUTTAL CROSS-EXAMINATION

10 BY MR. MASTANDO:

11 Q Good afternoon, my name is Antony Mastando, and I
12 am one of the attorneys for the Mass Media Bureau.

13 Would you please relate to us what your
14 responsibilities were as GM --

15 MS. SADOWSKY: Objection.

16 BY MR. MASTANDO:

17 Q -- for KFMZ?

18 MS. SADOWSKY: Objection, Your Honor.

19 MR. MASTANDO: What ground?

20 MS. SADOWSKY: I think it goes beyond the matters
21 brought up on direct. And if I am not mistaken, it's dealt
22 with the use -- the original testimony, which was never
23 cross-examined. I think it's late in the day to --

24 JUDGE STEINBERG: What are you going to use this
25 information for?

1 MR. MASTANDO: I will withdraw the question.

2 BY MR. MASTANDO:

3 Q As a GM, would your primary responsibilities be
4 the sale and business aspect of the stations?

5 A We're a commercial radio station, so obviously the
6 business aspects of it are critical. But without a product
7 on the air, we don't -- without ratings, and therefore do
8 not have the commercial viability. So my responsibilities
9 are making sure that the station stays on the air through a
10 good engineering department, making sure that the sound of
11 the station is as agreed upon and appropriate for what we
12 are trying to do at that time, and sales are being achieved,
13 and billing is being handled properly. So I really have
14 almost answered your first question. But those are the
15 areas.

16 Q So would it then be safe to say that sales and
17 business are your primarily responsibilities as a GM?

18 A I don't think the word "primary" is appropriate.
19 I think if you are prioritizing, obviously we need to have
20 the sales in order to make payroll. So sales are critical
21 to the function of the radio station, without a doubt.

22 Q So if Janet Cox were to have testified that a GM's
23 primary responsibilities were sales and business, would she
24 be a liar?

25 MS. SADOWSKY: Objection.

1 JUDGE STEINBERG: Tone it down.

2 BY MR. MASTANDO:

3 Q Would she be lying?

4 JUDGE STEINBERG: Basically, would that testimony
5 be accurate or --

6 THE WITNESS: Well, I hesitate with the word
7 "primary," because one of my -- I look at my function as
8 being, one, to make sure that we are in compliance legally;
9 that we are -- that our public service activities are
10 extensive; that the station sounds the way it should; and
11 that the on-air people are -- if you ever worked at a rock
12 station -- are behaving, and --

13 JUDGE STEINBERG: Have all their clothes all at
14 all appropriate times, right?

15 THE WITNESS: Actually, we don't -- this is radio.
16 But, no, I am the one who fields complaints from the
17 listeners. So that I look at -- and the station meets its
18 billing goals. So I look at all those as my primary
19 function. It's very difficult to separate them.

20 BY MR. MASTANDO:

21 Q What were Paul Hanks' responsibilities as you
22 understood them?

23 A Paul Hanks was program director, which meant that
24 he was responsible for the music that the station played,
25 and how frequently. In other words, he developed the play

1 list. He was responsible for hiring announcers. He was
2 responsible for training announcers, and continuing the
3 ongoing process of critiquing announcers.

4 Q Did Paul Hanks have responsibilities outside of
5 just KFMZ, as far as you know?

6 A For a very brief time in, I believe, '92, '93, he
7 was involved somewhat with WZZQ in Terre Haute, counseling,
8 advising, and -- pardon?

9 Q Isn't it a fact that he had the title of corporate
10 program director for the stations?

11 A No. That was potentially the title he was going
12 to be given had that materialized.

13 Q Was there not a press release from the
14 Contemporary Broadcasting Group?

15 A Correction. You may be correct. The press
16 release may have gold out in anticipation of him filling
17 this position.

18 Q And what would that press release have said, to
19 your recollection?

20 A It may well have said that Chris Kellogg has been
21 named rock program director or corporate program director
22 for Contemporary Broadcasting, Contemporary Media
23 Broadcasting.

24 Q Who did he report to on the WZZQ side of the
25 house?